



Third Program Year Action Plan

The CPMP Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Executive Summary: 2012 Action Plan (Program Year 3 Of 2010-2012 Consolidated Action Plan)

This Third Program Year Annual Action Plan outlines the activities which will be undertaken during the 2012 program year, beginning August 1, 2012 and ending July 31, 2013 using federal funds allocated to the Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County Entitlement program. Programs and activities described in this Action Plan will principally benefit low and moderate income populations of the service areas of the HOME Consortium and the Urban County.

In Program Year 2012 (Program Year Three), the MTHC HOME Consortium will provide an affordable housing program, Construction of Elderly Congregate Housing, that will serve low to moderate income renters.

Program Year 2012 is the fifth year for the Tulsa County Community Development Block Grant Urban County. The Community Development Block Grant (CDBG) Program provides federal funds to eligible units of local governments to address community development needs. CDBG regulations permit counties who meet the threshold of a total combined population of 200,000 or more (excluding metropolitan cities) to qualify as an urban county to receive a direct federal allocation of CDBG funds. Tulsa County, with a population of 247,918, qualified for Entitlement status with HUD to receive CDBG funds as an Urban County, beginning August 1, 2008. Unincorporated Tulsa County and ten Tulsa County incorporated places, which includes the City of Sapulpa (whose city limits include a portion of Tulsa County) participate as members of the Tulsa County CDBG Urban County Program. The City of Broken Arrow, formerly a CDBG Entitlement city since 1988, relinquished its status as an entitlement in order to join the Urban County. The City of Tulsa is not a member.

AVAILABLE FUNDS

The FY 2012 allocations for project activities are:

HOME Consortium Funds: \$791,583

Construction of Elderly Congregate Housing	\$712,425
Administration	\$ 79,158

Tulsa County CDBG Urban County Funds: \$1,219,361

City of Bixby (Midland Addition Drainage Improvements- Phase 2)	\$ 54,853
City of Broken Arrow (Central Park Sports Courts)	\$348,073
City of Jenks (ADA Sidewalk Accessibility in Downtown- Phase 4)	\$ 42,748
City of Owasso (Old Town Sidewalks and Curb Repair)	\$113,845
City of Sand Springs (Old Town Sewer Improvements)	\$ 68,248
City of Sapulpa (Cleveland Ave. Reconstruction- Phase 5)	\$134,888
Town of Skiatook (Renovation of Building for Senior Center)	\$ 69,097
Town of Sperry (Purchase of Fire Equipment)	\$ 69,097
Tulsa County-Uninc. (Scottsdale Addition Street Rehabilitation)	\$ 69,097
Public Services activities (Awarded by Broken Arrow)	\$ 66,511
Administration (12%)	\$182,904

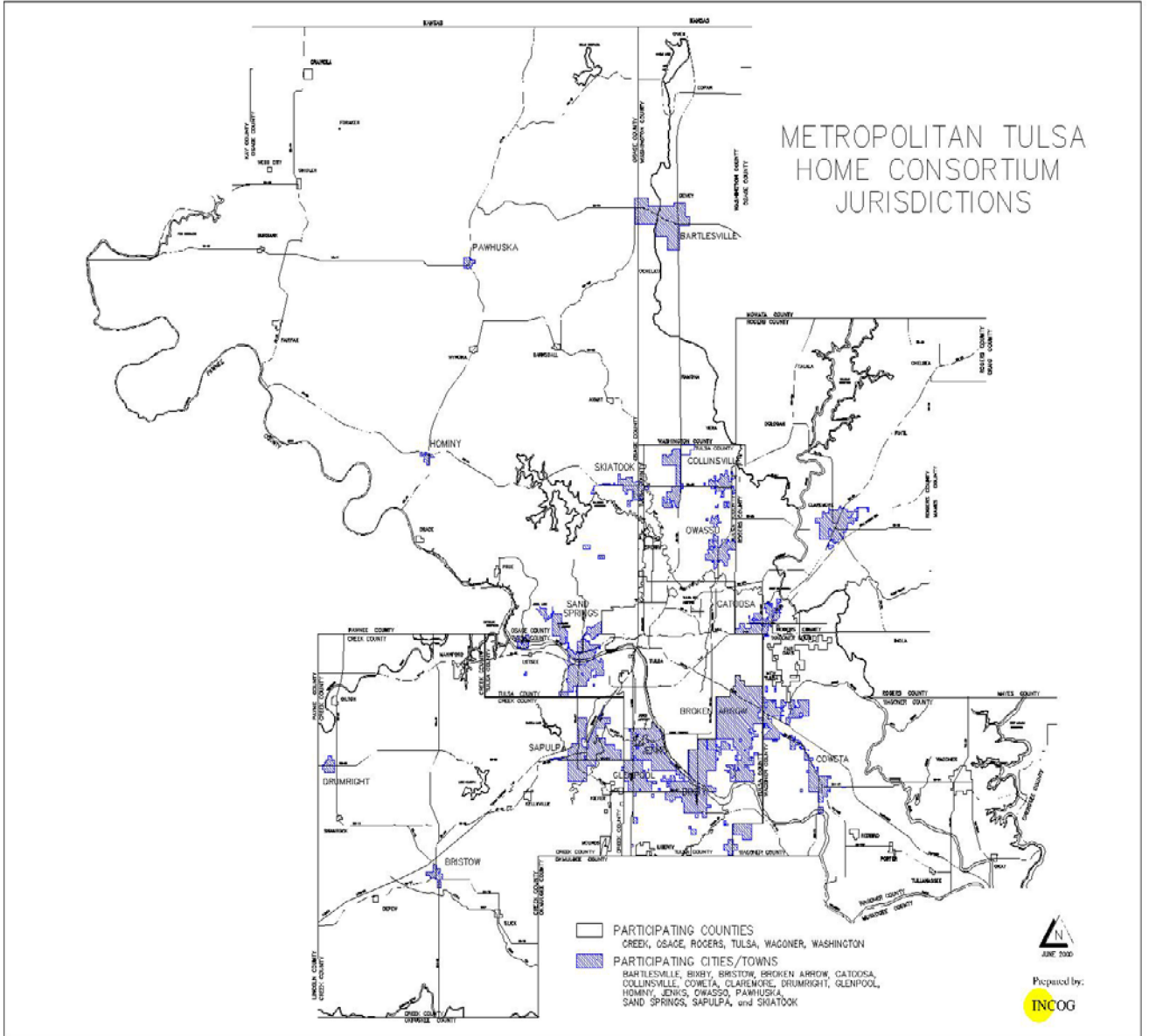
Tulsa County

TULSA COUNTY
HOME CONSORTIUM
MEMBERS FY 2010-2012

LOCAL UNIT OF GOVERNMENT	2010 POPULATION**
Tulsa County (lead entity)	*34,942
Creek County	*33,481
Osage County	*23,802
Rogers County	*50,631
Wagoner County	*33,072
Washington County	*9,864
Broken Arrow	98,850
Bartlesville	35,750
Owasso	28,915
Bixby	20,884
Sapulpa	20,544
Sand Springs	18,906
Claremore	18,581
Jenks	16,924
Glenpool	10,808
Coweta	9,943
Skiatook	7,397
Catoosa	7,151
Collinsville	5,606
Bristow	4,222
Pawhuska	3,584
Hominy	3,565
Drumright	2,907
Sperry	1,206
Total	501,535

*Unincorporated population of the County

**2010 Census Data-released April, 2011



Tulsa County
CDBG Urban County Designation
Population Summary

Place/Geographic Area	Tulsa County part	Part in other Counties	Total Population
City of Bixby	20,706	178	20,884
City of Broken Arrow	80,634	18,216	98,850
City of Collinsville	5,599	7	5,606
City of Glenpool	10,808	0	10,808
City of Jenks	16,924	0	16,924
City of Owasso	26,301	2,614	28,915
City of Sand Springs	18,515	391	18,906
City of Sapulpa	43	20,501	20,544
Town of Skiatook	2,130	5,267	7,397
Town of Sperry	1,177	29	1,206
Unincorporated Tulsa County	34,942	0	34,942
Total	217,779	47,203	264,982

Split places by other County

Creek County - Sapulpa

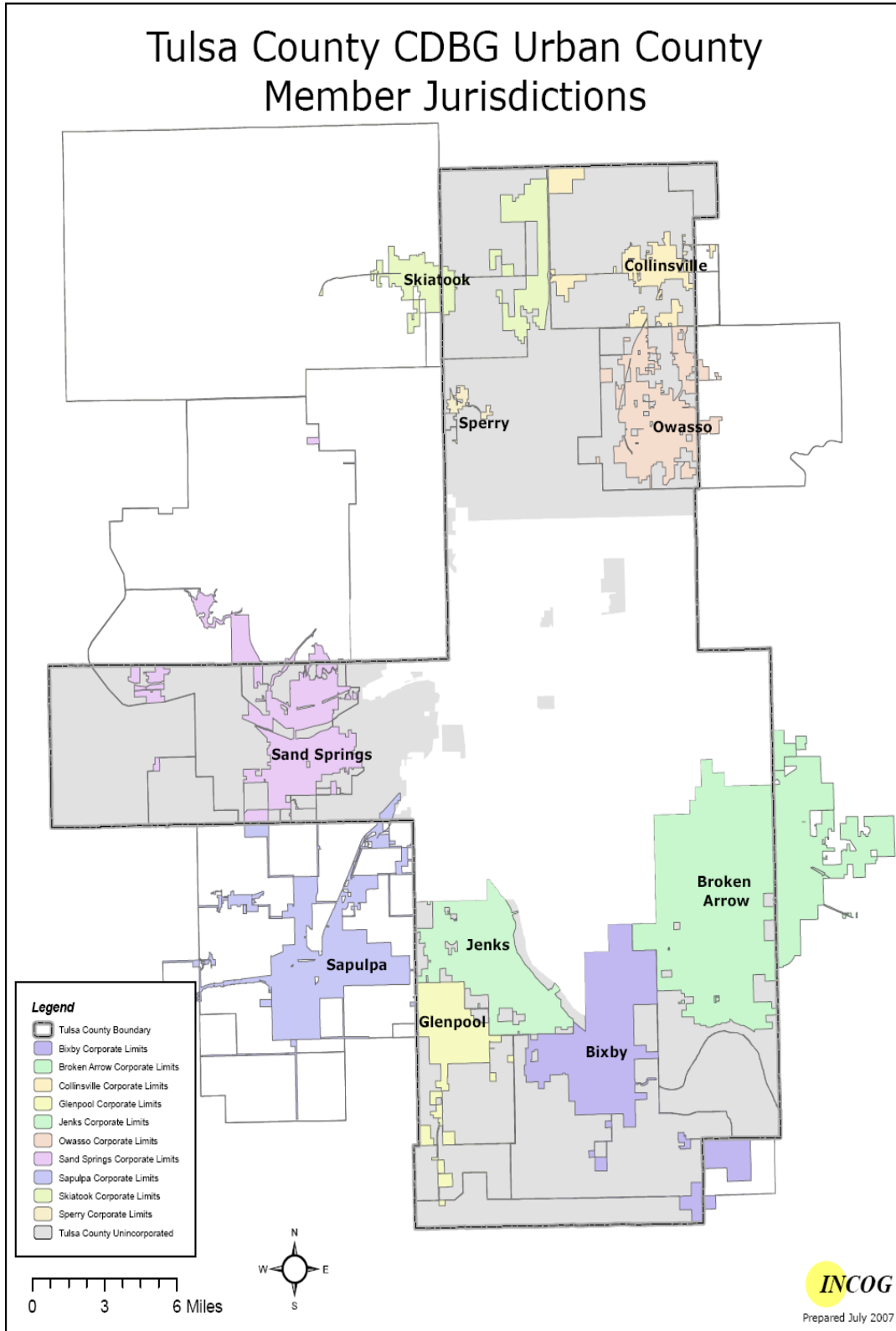
Osage County - Sand Springs, Skiatook and Sperry

Rogers County - Collinsville and Owasso

Wagoner County - Bixby and Broken Arrow

Source: U.S. Bureau of the Census

Population by Place by County: 2010 Census



SUMMARY OF OBJECTIVES AND OUTCOMES FOR 2012

SPECIFIC OBJECTIVES AND STRATEGIES

HOUSING

Priority Need: Extremely low, Very low and Low Income Owner-occupied Households

Approximately three percent of all lower income households are experiencing housing problems not related to cost. By income groups, 181 extremely low, 191 very low, and 648 low income households are experiencing housing problems.

Strategy: Housing Rehabilitation Program

A moderate rehabilitation program for owner-occupied housing will provide an opportunity for homeowners to live in safe and sanitary housing. The program is structured as a low-interest or deferred loan based on annual income and household size. It is targeted to extremely low, very low, and low income households in the Consortium.

Goal: In FY 2012, the Consortium's Moderate Housing Rehabilitation program will again be re-assessed to determine the viability of continuing the program. Current limits of spending up to \$25,000 to bring units up to code are not adequate to ensure meeting HQS. No funds are budgeted for this activity in FY2012.

Priority Need: Very low and Low Income Renter Households

Fifty-four percent (54%) of the 11,815 very low income and 20% of the 7,192 low income households are experiencing a housing cost burden exceeding 30% of their income.

Strategy: Homebuyer Assistance

Many of these families are able to make monthly mortgage and utility payments, yet they lack initial funds necessary for down payment and closing costs. The Homebuyer Program is designed to provide assistance for those initial costs and facilitate home purchases for qualified families. Nonprofit partners provide homeowner education for these clients as well.

Goal: No funds are budgeted for this program in FY2012. A large appropriation of FY2010 funds was targeted to Homebuyer Assistance, and this amount is adequate to address current needs.

Priority Need: Extremely low Income Renter Households

Fifty-eight percent (58%) of all extremely low income renters are paying more than 30% of their monthly income on rent. Among household types, 49% of elderly, 62% of small related, 47% of large related, and 64% of all other households.

Strategy: Rental Assistance

Rental assistance through the Housing Vouchers offered by Public Housing Authorities and the Oklahoma Housing Finance Agency provide options for smaller households to secure decent, safe and sanitary housing within their income range.

Goal: The Consortium will support efforts to secure additional tenant-based rental assistance for eligible households in the area through Section 8 Housing Voucher programs.

Priority Need: Availability of Rental and Owner-occupied Housing

Vacancy rates among the consortium cities are generally decreasing and of the vacant units, a portion is uninhabitable. Decreasing available housing stock, increasing populations, renewed economic activity and higher housing costs create an increased demand for new and affordable housing.

Strategy: New Construction

Development of infill rental and owner-occupied housing on vacant lots.

Goal: To see 40 affordable rental units developed using public/private partnerships.

HOMELESS

Priority Need: Identify Level of Homelessness and Subpopulations

An accurate count of the number of homeless persons and subpopulations continues to be difficult yet agencies are experiencing significant demand under healthy economic conditions.

Strategy: Coordination with Homeless Services Network and Housing and Urban Development to Strengthen Efforts for Assessing Homeless

Estimates from the City of Tulsa and the State indicate there are rural homeless not accounted for in survey data. In recent years assessments have been conducted primarily within the City of Tulsa; however the City of Broken Arrow has participated in the *Point in Time* One-night Consumer Survey counts the last four years with the 2011 count held on January 26, 2012. Efforts are continuing to work with the Network and area agencies to develop an improved system.

Goal: Continue to support an improved count of the homeless and subpopulations within the Consortium and assist in the determination of the adequacy of existing shelters over the next three years.

OTHER SPECIAL HOUSING NEEDS

Priority Need: Extremely low, Very low and Low Income Elderly Rental and Owner Households

Eight Hundred Thirty (830) extremely low, 600 very low, and 159 of low income elderly renters are spending more than 30% of their income on rent. Among elderly owners, 2,143 of extremely low, 959 of the very low, and 940 of low income households are spending more than 30% of their income on housing expenses. As the cost of housing continues to rise, elderly incomes often remain virtually stable forcing more elderly to pay a greater percentage of their income on housing or move from their communities. This number is likely to increase as the population ages.

Strategy: Construction of congrate rental housing for the elderly

Most social service providers agree that housing and supportive services for the elderly go hand in hand. The provision of affordable rental housing and supportive services within one complex will allow the elderly to continue to lead independent or semi-independent life styles.

Goal: Provide a minimum of 40 affordable rental units for the elderly. Units will be targeted to the extremely low, low and moderate income groups. Sources of funding will include Consortium HOME funds, Low Income Housing Tax Credits, Federal Home Loan Bank and private lending institutions.

COMMUNITY DEVELOPMENT

Priority Need: Sustainability of Community

Communities participating in the CDBG Urban County will seek to improve the quality and increase the quantity of public improvements for low income residents within their jurisdictions. During the period of the FY2012 Action Plan, infrastructure and neighborhood revitalization activities will be undertaken, such as storm sewer and water line improvements, sanitary sewer line extension, park improvements and ADA sidewalk accessibility.

Strategy: Construction of Public Improvements

Activities that will improve the quality and increase the quantity of public improvements, such as drainage improvements, water and sewer gravity lines, and sidewalks, and that improve the quality of residential areas through enhancements to neighborhood parks will be a focus of area communities.

Goal: Improvements to parks to improve neighborhoods; provide for construction of sanitary sewer and drainage improvements for 3,204 residents; and improved accessibility for 1,564 handicapped and elderly people.

SPECIFIC OUTCOMES

Consolidated funds in the amount of **\$2,010,944** for the HOME Consortium and Urban County for the 2012 program year will be allocated among the following nationally reportable outcomes established by HUD:

	Availability/ Accessibility	Affordability	Sustainability
Create Suitable Living Environment	44%	0%	17%
Sapulpa- Street Improvements			\$134,888
Tulsa County- Street Improvements			\$69,097
Bixby- Drainage Improvements			\$54,853
Sand Springs- Sewer Improvements			<u>\$68,248</u>
Jenks- ADA Sidewalks	\$42,748		
Administration- CDBG	\$182,904		
Broken Arrow- Park Improvements	\$348,073		
Owasso- Sidewalk Improvements	\$113,845		
Skiatook- Senior Center Renovation	\$69,097		
Sperry- Fire Equipment	\$69,097		
BA Neighbors Outreach	\$16,756		
Margaret Hudson Counseling	\$11,805		
Child Abuse Network	\$15,000		
BA Seniors	\$12,567		
BA Neighbors Treetops Outreach	\$5,000		
Arrow Springs Elem. After School Tutors	<u>\$5,383</u>		
Total	\$892,275		\$327,086
Provide Decent Affordable Housing	4%	35%	0%
Innovative Housing Initiatives			
Elderly Rental Housing		<u>712,425</u>	
Administration- HOME	<u>79,158</u>		
Total	\$79,158	\$712,425	
Create Economic Opportunities	0%	0%	0%

Creating Suitable Living Environment: Availability/Accessibility

In the FY 2012 program year, five members of the Tulsa County CDBG Urban County will fund activities that will enhance the quality of life for specific populations within their jurisdictions. These activities will improve access to public services for seniors, disabled, and other low- and- moderate income residents, with the following specific outcomes:

- City of Broken Arrow- Park improvements to Central Park to construct new sports courts to provide improved recreational opportunities to serve residents of low and moderate income neighborhood.
- **Outcome:** Enhanced accessibility to recreational opportunities for 2,900 residents
- City of Owasso- Sidewalk installation and repair to ensure ADA compliant connections between low to moderate income residential neighborhoods and essential services such as the post office, drug and grocery stores, and other businesses.
Outcome: Enhanced availability and accessibility for 1,181 persons
- City of Jenks- Sidewalk installation and repair to ensure ADA compliant connections between low to moderate income residential neighborhoods and essential services such as the post office, drug and grocery stores, and other businesses.
Outcome: Enhanced accessibility for 1,415 residents
- Town of Skiatook- Renovations to an existing building for relocation of the Senior Center operation to provide city senior residents a more safe and secure facility for daily meals and activities.
Outcome: Enhanced availability and accessibility for 905 seniors
- Town of Sperry- Purchase of fire equipment to improve the health and safety of all Town residents by providing more adequate response and action in the event of an emergency and improve communications within the fire department.
Outcome: Enhanced availability and accessibility for 1,206 persons

In the FY 2012 program year, Broken Arrow will fund six public service agencies with CDBG funds that will make services available to low and moderate income persons and improve the quality of their living environment. These activities will improve access to public services for youth, seniors, disabled, and other low- and- moderate income residents in the City of Broken Arrow, with the following specific outcomes:

- Arrow Springs Elementary After School Tutoring:
Outcome: Increased reading/math skills of 40 students
- Broken Arrow Seniors:
Outcome: Increased access to services at senior center for 3,500 seniors
- Broken Arrow Neighbors Outreach/Advocacy Office:
Outcome: Advocacy/referral of services to 240 persons
- Broken Arrow Neighbors Outreach/Advocacy at Treetops Apartments:

Outcome: Advocacy services provided to 85 elderly/disabled clients

- Margaret Hudson Pregnant Adolescents Counseling:
Outcome: Counseling to 70 students and families
- Child Abuse Network:
Outcome: Forensic interviews of 90 allegedly abused children

Once completed, these public service activities will directly improve the living environment for more than 4,025 low- and-moderate income residents of Broken Arrow.

Creating Economic Opportunities: Availability/Accessibility

No projects funded with 2012 program year funds

Creating Suitable Living Environment: Affordability

No projects funded with 2012 program year funds

Providing Decent Affordable Housing: Affordability

One project to provide affordable housing units to low and moderate income households will be funded with FY 2012 HOME funds. The project involves the creation of affordable units through new construction or rehabilitation.

- HOME Construction of Elderly Congregate Apartments:
Outcome: Construction of 40 units of rental housing for low income Elderly.

The creation of 40 affordable units for low income households will be the result of these housing activities.

Creating Economic Opportunities: Affordability

No projects funded with 2012 program year funds

Creating Suitable Living Environment: Sustainability

In the FY 2012 program year, municipalities in the Tulsa County CDBG Urban County will fund public facilities and improvements that sustain a suitable living environment. These activities will improve the quality and increase the quantity of public improvements, such as sewer and water line improvements, storm sewer improvements, street improvements and drainage improvements, with the following specific outcomes:

- City of Bixby- Phase 2 construction of new storm sewer in Original Townsite and Midland Addition to relieve localized flooding for the residents of the low income neighborhood:
Outcome: Improved quality of environment for 280 people.
- City of Sapulpa- Phase 5 of installation of storm drainage improvements to alleviate flooding of residential area:
Outcome: Improved quality of environment for 89 people.
- City of Sand Springs- Repair and replacement of existing deteriorated sewer lines in an area north of City Hall to improve infrastructure for residents of older neighborhood.

Outcome: Improved quality of environment for 1,116 residents

- Tulsa County-Unincorporated– Reconstruction and rehabilitation of all streets in the Scottsdale Addition in the Turley area of north Tulsa County to repair deteriorated streets to improve infrastructure for area residents of low income block group:

Outcome: Improved quality of environment for 1,683 persons.

Providing Decent Affordable Housing: Sustainability

No projects funded with 2012 program year funds

Creating Economic Opportunities: Sustainability

No projects funded with 2012 program year funds

PAST PERFORMANCE EVALUATION

In recent years, significant contributions have been made by the HOME Consortium to supply new affordable housing units to the member governments. This includes funding each year for the construction of affordable rental units for the elderly, construction of innovative single-family housing units to promote homeownership, homebuyer assistance, and owner-occupied housing rehabilitation to maintain existing housing stock. To date, eleven MTHC Consortium cities have benefited from the construction of elderly congregate housing projects that were financed in part with the Consortium's HOME funds. Two member communities, Sapulpa and Broken Arrow, have two HOME-funded elderly projects in their cities. Vintage Housing and Sooner Management Inc. have developed and managed these properties, with the majority of the locations having 100% occupancy. Community Action Project Tulsa County (CAPTC) has developed Innovative Housing and has provided important infill development in Central Sand Springs with the construction of new single-family homes. Community Action Resource and Development (CARD) has created affordable new single-family units in Bartlesville, Claremore, Coweta, Sapulpa, and unincorporated Rogers County. Homebuyer Assistance has been provided to all 24 member governments by CAPTC and CARD. Fourteen of the Consortium's 17 cities and two counties have received the Owner-occupied Housing Rehabilitation Program.

The City of Broken Arrow has utilized CDBG funds for numerous public works projects that have benefited low to moderate income residents of the residential neighborhoods in the Central City. Several social service agencies have also received CDBG funding for their programs that serve the special needs populations in the City of Broken Arrow.

Citizen Participation 91.200 and 91.220(b)

1. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan).
 - a. Based on the jurisdiction's current citizen participation plan, provide a summary of the citizen participation process used in the development of the consolidated plan. Include a description of actions taken to encourage participation of all its residents, including the following:
 1. low- and moderate-income residents where housing and community development funds may be spent;
 2. minorities and non-English speaking persons, as well as persons with disabilities;
 3. local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, community and faith-based organizations);
 4. residents of public and assisted housing developments and recipients of tenant- based assistance;
 5. residents of targeted revitalization areas.

A Citizen Participation Plan is in place for the Consolidated Plan process. The Plan details participation of groups impacted by CDBG and HOME funding, and encourages participation of low and moderate income residents, minorities and non-English speaking persons where significant populations exist, residents of assisted housing, and residents of targeted areas. Each of the eleven members of the CDBG Urban County is required to hold a community development Needs Public Hearing within their communities, per the Tulsa County CDBG Urban County Application guidance. Several of the communities hold informational meetings in neighborhoods targeted for CDBG project assistance. Notice of the public hearings are given via community newspaper publication or posting. The Policy Committee, comprised of public officials from the local jurisdictions, is apprised of the public participation process, and actively solicits participation in their communities.

Tulsa County serves as the lead entity for both the Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County. The HOME Consortium and the Tulsa County CDBG Urban County entitlement grants are both administered by the staff of the Indian Nations Council of Governments (INCOG).

The INCOG staff conducted needs assessment public hearings at various locations in the Consortium service area and in the Tulsa County CDBG Urban County and developed the plan in accordance with input from the hearings.

Dates of Public Hearings held by Member Jurisdictions:

Bixby: February 13, 2012 6:00PM
Collinsville: May 21, 2012 7:00PM
Glenpool: May 7, 2012 7:00PM
Jenks: March 19, 2012 7:00PM
Owasso: March 20, 2012 6:30PM
Sand Springs: March 26, 2012 7:00PM

Sapulpa: April 16, 2012 7:00PM
Skiatook: May 29, 2012 7:00PM
Sperry: May 10, 2012 6:00PM
Tulsa County: March 26, 2012 9:30AM

The minutes from the Tulsa County HOME Consortium and CDBG Urban County Needs Assessment Public Hearing conducted during the Annual Action Plan process is included below.

**METROPOLITAN TULSA HOME CONSORTIUM
TULSA COUNTY CDBG URBAN COUNTY
NEEDS ASSESSMENT PUBLIC MEETING
March 26, 2012
9:30 AM
Tulsa County Board of Commissioners**

Meeting Summary

Citizens Present

*No citizens spoke at this public hearing

Staff Present

Claudia Brierre, INCOG

County Commission Chairperson John Smaligo called to order the March 26, 2012 MTHC HOME Investment Partnership and the Tulsa County CDBG Urban County public hearing at 9:30 A.M. in the County Commission Room. The purpose of the public hearing was to receive recommendations on housing needs for the 18 cities and 6 counties within the Metropolitan Tulsa HOME Consortium area and to receive recommendations on non-housing community development needs for the 10 cities and the unincorporated area of Tulsa County in the Tulsa County CDBG Urban County. Claudia Brierre explained that nationally, HOME and CDBG Entitlement grantees experienced dramatic and significant cuts in funding. The Federal government released budget numbers for formula grant allocations for next year in early February. Tulsa County will receive \$791,583 in FY2012 HOME funds and \$1,219,361 in FY2012 CDBG funds for the program year beginning August 1, 2012. This represents a decrease of \$509,064 (39%) in HOME funds and a decrease of \$175,630 (12.5%) in CDBG funds over last year's allocations. The MTHC HOME Consortium includes the cities of Bartlesville, Broken Arrow, Bixby, Bristow, Catoosa, Claremore, Collinsville, Coweta, Drumright, Glenpool, Hominy, Jenks, Owasso, Pawhuska, Sand Springs, Sapulpa, Skiatook, Sperry, and the unincorporated areas of Creek, Osage, Rogers, Tulsa, Wagoner, and Washington Counties. The CDBG Urban County includes the cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Sapulpa, Skiatook, Sperry, and the unincorporated area of Tulsa County. Ms. Brierre explained that recommendations received at the 2012 public hearing will be considered by INCOG, the MTHC Policy Committee, and the CDBG Urban County Policy Committee in developing an Annual Action Plan to be submitted to HUD. Citizens at the March 26th public hearing were requested to participate in the hearing and express their views on housing needs in the MTHC Consortium area and on non-housing community development needs in the CDBG Urban County area. Comments or proposals, where feasible, will be incorporated into the plan to be submitted to HUD by June 15, 2012.

The FY 2012 Grant Year begins on August 1, 2012. For the MTHC HOME program, the principal program activity will be Elderly Congregate housing new construction. Tulsa County is the lead agency in the MTHC Consortium. The Tulsa County CDBG Urban County has six cities in the Metro Cities category that each receive a specific allocation of CDBG funds. Four smaller communities and Tulsa County are in the Competitive category. The Urban County cities develop infrastructure improvement projects and/or create other non-housing community development projects in low to moderate income residential areas. Today's public hearing was to receive comments from citizens regarding the FY 2012 Action Plan and housing needs for the MTHC area and non-housing community development needs in the Tulsa County CDBG Urban County area. Chairperson Smaligo asked if anyone was present to speak on this item. No citizen comments were received at the public hearing. The public hearing was adjourned at 9:40 AM.

b. Identify agencies, groups, and organizations that participated in the process. This should reflect consultation requirements regarding the following:

1. General §91.100 (a)(1) - Consult with public and private agencies that provide health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during the preparation of the plan.
2. Homeless strategy and resources to address needs of homeless §91.100 (a)(2) – Consult with continuum of care, public and private agencies that address the housing, health, social services, victim services, employment, or education needs of low-income persons, homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and person at risk of homelessness; publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions), and business and civic leaders.
3. Metropolitan planning §91.100 (a)(5) -- Consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction, i.e. transportation, workforce development, economic development, etc.
4. HOPWA §91.100 (b)-- Largest city in EMSA consult broadly to develop metropolitan-wide strategy for addressing needs of persons with HIV/AIDS and their families.
5. Public housing §91.100 (c) -- Consult with the local public housing agency concerning public housing needs, planned programs, and activities.

Consultation with agencies, groups, and organizations that participated in the process occurred across a broad spectrum of interested parties. The Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County do not receive federal funding for homeless services and programs; therefore they do not provide housing and related services for the homeless.

Tulsa County and the cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Skiatook, and Sperry are part of the Tulsa County Continuum of Care. An INCOG staff person participates in the monthly meetings of COC Steering Committee and the Homeless Services Network. The agencies that receive Continuum of Care funding and the shelters that receive ESG-Emergency Shelter Grants serve clients from the City of Tulsa and from Tulsa County and the communities identified above.

The MTHC Policy Committee is comprised of appointees from the 24 member governments in the Consortium. These members include county commissioners, city clerks, city managers, city planners, housing authority directors, financial lenders, real estate professionals, and other government appointees from the six-county area. The staff receives information from the local Community Action Agencies that also serve as the Consortium's CHDO's and subrecipients. These agencies have direct contact with the public as they provide services to children, the elderly, the disabled, and to low to moderate income households and individuals. A Consortium staff member serves on the Tulsa County Continuum of Care Steering Committee and also attends the monthly meetings of the Homeless Services Network. These coordination efforts will continue during the next year to ensure that housing and community development needs are addressed in the service area.

The HOME Consortium service area and the Urban County CDBG municipalities generally fall within the Tulsa Transportation Management Area (TMA). The administrator of the HOME and CDBG programs for Tulsa County, INCOG, was designated by the governor of Oklahoma as the Metropolitan Planning Organization (MPO) for the Tulsa region in accordance with federal law. As the MPO, INCOG, in cooperation with the Oklahoma Department of Transportation (ODOT) and Metropolitan Tulsa Transit Authority (MTTA), is responsible for the development of regional transportation plans and programs for the Tulsa Transportation Management Area (TMA). INCOG staff administering the HOME and CDBG programs consults with the regional transportation plans and programs to seek transportation grant opportunities for member communities, particularly those communities which have elderly housing developments funded through the HOME program. The market analysis for proposed elderly housing developments is examined to determine the availability or proximity of the site to public transportation. In several instances, the member community has provided transportation services directly to the elderly complex.

Tulsa County and the Cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Sapulpa, Skiatook, and Sperry do not operate Public Housing Authorities and there are no public housing units within those cities or within Tulsa County.

There are three public housing authorities located within the MTHC Consortium area:

Bristow Public Housing Authority operates 159 units.

Drumright Public Housing Authority operates 148 units.

The Osage County Housing Authority has 282 units at six locations in the county:

- Barnsdall
- Cedar Ridge
- Fairfax
- Hominy
- Osage

- Shidler

Coordination between the Homebuyer Assistance subrecipient agencies and the Consortium's three Public Housing Authorities will provide targeted outreach to residents and tenants for the purpose of ensuring that the Homebuyer Assistance funds may be used to provide downpayment assistance for these residents.

2. Provide a summary of citizen comments or views on the plan.

Through the public hearing process in the local jurisdictions, citizens were offered the opportunity to comment on the proposed use of funds. Comments appeared to be supportive of proposed projects in each locality.

3. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

No written comments were received.

Resources 91.220(c)(1) and (c)(2)

4. Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.
5. Explain how federal funds will leverage resources from private and non-federal public sources, including how matching requirements of HUD programs will be satisfied.

FEDERAL RESOURCES:

Community Development Block Grants

The Tulsa County CDBG Urban County was created in 2008 with Tulsa County as the lead entity. The Urban County includes Broken Arrow, a former CDBG Entitlement city, and the cities of Bixby, Jenks, Owasso, Sand Springs, and Sapulpa which formerly received CDBG allocations from the State of Oklahoma Small Cities program. Additionally the cities of Collinsville, Glenpool, Skiatook, and Sperry have joined the Tulsa County CDBG Urban County and are part of the competitive cities category in the Urban County. Tulsa County is also part of the competitive category. The Tulsa County CDBG Urban County receives a Community Development Block Grant to carry out a wide range of community development activities. In FY 2012 the CDBG Urban County will receive a direct allocation of \$1,219,361 from the U.S. Department of Housing and Urban Development.

The Oklahoma Department of Commerce Small Cities CDBG Program has a total of \$1,370,000 available for FY 2012 with allocations (set-asides) for cities in Oklahoma that range in population from 15,000 to 50,000. The new FY 2012 projects will be identified after June 15, 2012. Two MTHC Consortium member communities located outside of Tulsa County, Bartlesville and Claremore, received FY11 CDBG funding allocations in the ODOC Small Cities program. Bartlesville will utilize its FY11 Small Cities allocation of \$72,813 to install new sidewalks along West 14th Street in the West Bartlesville Improvement District. The City of Claremore received \$62,643 in FY11 Small Cities CDBG funds. In recent years Claremore has used this funding for waste water system improvements.

FY11 Oklahoma Department of Commerce CDBG Community Revitalization awards were announced in June 2011 and no locations in the MTHC area were funded. FY 2012 funding announcements will occur after June 15, 2012. The City of Catoosa is installing drainage improvements along East Admiral Place utilizing \$150,000 in CDBG Community Revitalization funds it received from ODOC in FY10. This project is underway after a delay due to the relocation of a City of Tulsa utility line. The project is utilizing FY04 funds that were reallocated in FY10. The completion of the drainage improvement project is anticipated by the end of August 2012.

FY11 Oklahoma Department of Commerce grants in the Water and Wastewater category include two grants in the Phase I Water Engineering Category. Creek County Rural Water District #10 received funding for water treatment improvements

that will provide a system distribution extension and Osage County Rural Water District #20 received funds for a water treatment plant upgrade at Hulah Lake. Phase I allows for the engineering of the projects with Phase II approved for construction to occur in the second year. FY12 applications for water and wastewater engineering and construction were submitted to the Oklahoma Department of Commerce on May 4, 2012. Awards in this category should be announced in late August 2012.

FY 2012 REAP funds were awarded by the State of Oklahoma (via the sub-state planning districts) to four MTHC Consortium jurisdictions:

Project Name: Highway 48 Water Line Extension
Subcontractor: City of Bristow
County: Creek
Project Description: Construction of Highway 48 Water Line Extension south of Bristow
Project Budget: \$3,500,000+
Other Funds: SRF, IHS \$3,500,000
REAP Funding: \$40,000

Project Name: Sperry Police Vehicle and Fire Equipment
Subcontractor: Town of Sperry
County: Tulsa
Project Description: Purchase one police car and assorted fire equipment
Project Budget: \$47,058
Other Project Funds: Local \$7,058
REAP Funding: \$28,787 (Partial Funding)

Project Name: Collinsville Street Resurfacing
Subcontractor: City of Collinsville
County: Tulsa
Project Description: Resurfacing of 12th Street
Project Budget: \$95,000
Other Project Funds: Local \$45,000
REAP Funding Amount: \$50,000

Project Name: Sequoyah School Parking Lot
Subcontractor: Rogers County
County: Rogers
Project Description: Rebuild parking lot at Sequoyah Elementary School.
Project Budget: \$99,765
Other Project Funds: Local \$59,765
REAP Funding Amount: \$32,284 (Partial Funding)

CDBG EDIF Projects

The Community Development Block Grant–Economic Development Infrastructure Financing program helps eligible cities, towns, and counties with the financing of infrastructure improvements for business expansions and start-ups. This stimulates job creation and investment in those communities while helping to diversify the state’s economic base. CDBG-EDIF awards are made throughout the year by the Oklahoma Department of Commerce. The City of Pawhuska received a \$500,000

CDBG-EDIF grant from the Oklahoma Department of Commerce in 2010. This was the most recent EDIF grant to date in the MTHC Consortium area. This grant is part of a \$2,000,000 funding package made possible by a federal disaster declaration as a result of flooding that occurred in Osage County in June 2008. A major part of this package was a \$750,000 grant awarded to the Osage County Industrial Authority from the Economic Development Administration (EDA) to build a business incubator in Pawhuska. Other funding sources included the Osage Nation and the Osage County Industrial Authority. The City of Pawhuska provided \$50,000 as in-kind match that includes water and sanitary sewer service to the site.

Community Services Block Grant (CSBG)

Funded by the Department of Health and Human Services (HHS), this program is administered by the Oklahoma Department of Commerce which contracts with 20 Community Action Agencies (CAAs) in Oklahoma to provide a broad range of services affecting low income persons. Statewide \$8,062,881 was available in FY 2012 with an additional \$558,351 available for 11 American Indian Tribes in the State. Three Community Action Agencies that are also MTHC Consortium CHDO's receive CSBG allocations from the Oklahoma Department of Commerce: CAPTC, CARD, and DFCAF.

Community Mental Health Services Block Grant

Funded by HHS, this program provides funds for outreach services, case management, mental health, and substance abuse treatment. The Oklahoma Department of Mental Health and Substance Abuse administers the program. Funds are used for outpatient clinics providing mental health services, including medication to low-income persons.

Direct Loans or Capital Grants for Housing the Elderly or Handicapped (Section 202 and 811)

On November 16, 2011 the U.S. Department of Housing and Urban Development announced the Section 202 and 811 awards for FY 2011. There were no 202 awards in the State of Oklahoma. Only one Oklahoma community was awarded a capital advance from HUD's 811 Supportive Housing Program for Persons with Disabilities in the amount of \$1,431,700. This location was not in the MTHC Consortium area.

There are no pending/proposed Section 202 or Section 811 projects in the MTHC area at this time.

Emergency Community Services Homeless Program (EHP)

Funded through the Department of Health and Human Services (HHS) and administered by Community Action Agencies (CAA's) and other private non-profit agencies to provide a variety of social services including payment of utility bills, mortgage or rent assistance, and referrals to other agencies for shelter and food.

Emergency Food and Shelter Program (FEMA)

The Federal Emergency Management Administration (FEMA) provides funds that are distributed through various nonprofit agencies to provide food and emergency housing assistance to specific counties. FY10 awards were made to Creek, Tulsa, and Wagoner Counties. The Tulsa Area United Way was notified by FEMA early in 2011 to not expect any EFSP funding in 2011. FY 2012 EFSP funding appears unlikely. These funds come directly from FEMA and the United Way only assists with the application process and not the actual distribution of awards.

United Way

The United Way has awarded local recipient organizations funds to provide rent, mortgage, and utility assistance. Awards are done in 12-month periods known as program phases. The services provided by these United Way agencies help prevent homelessness and assist in local anti-poverty strategies. Agencies serving the MTHC Consortium Area include Bristow Social Services, Inc.; Broken Arrow Neighbors; Sand Springs Community Services; Wagoner Area Neighbors; Youth Services of Creek County; and Youth Services of Tulsa. Recent United Way Investments in MTHC area communities include:

- Bixby (\$173,552)
- Bristow (\$128,396)
- Broken Arrow (\$1,292,236)
- Catoosa (\$66,400)
- Drumright (\$11,440)
- Jenks (\$163,769)
- Owasso (\$357,421)
- Sand Springs (\$491,510)
- Sapulpa (\$465,145)

Emergency Solutions Grant Program (ESG)

Formerly known as the Emergency Shelter Grant program, statewide FY 2012 funds totaling \$1,667,424 are available to the Consortium area on a competitive basis through the Oklahoma Department of Commerce. This was a significant increase from the Statewide FY 2011 allocation of \$1,452,305 for Stages I and II. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, now the Emergency Solutions Grants (ESG) program. The ESG program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

HOME

The Metropolitan Tulsa HOME Consortium receives HOME funds on an annual basis from the Department of Housing and Urban Development. A total of \$791,583 will be available for FY 2012.

Approximately \$6,459,619 in FY 2012 HOME program funds through the Oklahoma Housing Finance Agency will be available statewide on a competitive basis. The state seeks to provide funds where an effective public/private/non-profit partnership is developed especially in rural areas of the State. The goal is to create innovative mechanisms and delivery to increase and expand the supply of affordable housing for low-income households. MTHC consortium members are eligible to apply for HOME funds through the State of Oklahoma in addition to any HOME funds that they might receive from the MTHC.

Weatherization Assistance Program (WAP)

The Weatherization Assistance Program, funded by the U.S. Department of Energy (DOE), enables low-income households to reduce their average annual energy bills by improving home energy efficiency. The Oklahoma Department of Commerce distributes funds for the program by contracting with local Community Action Agencies (CAA's) to manage the program at the local level. ODOC will distribute Weatherization funds to statewide community action agencies in the amount of \$679,076 in FY 2012. Both CARD and DFCAF receive WAP funds for use in the MTHC Consortium area. Qualified low-income applicant households are eligible to receive a wide variety of cost-effective energy efficiency measures, an inspection of major energy systems by service providers to ensure occupant safety, and an energy audit. Specific weatherization services include the installation of energy-efficient measures such as attic insulation, caulking and weather stripping, air sealing, and heating and cooling adjustments. An average of \$2,500 is spent on materials and labor for each home that is weatherized with priority given to elderly and handicapped households and to families with children.

Low-Income Home Energy Assistance Program (LIHEAP)

LIHEAP, provided by the U.S. Department of Health & Human Services and contracted to the Oklahoma Department of Commerce, provides additional energy-related cost savings to low-income Oklahomans. The LIHEAP program assists low-income households with energy related utility costs to prevent cut-offs. The program is available statewide and priority is given to elderly and handicapped applicants and to families with children. A total of \$36,094,642 in LIHEAP funds will be available for statewide distribution in FY 2012. This includes the regular block grant allocation for the state of \$32,787,799 and the tribal set-aside amount of \$3,306,843.

Low Income Housing Tax Credits (LIHTC)

The Oklahoma Housing Finance Agency Board of Trustees approved nearly \$4.3 million in reservations of Affordable Housing Tax Credits at their May 2012 meeting. These tax credits are utilized to build or rehabilitate affordable housing. The amount is received each year for the first 10 years of a project's operating period. A \$500,000 reservation results in a total tax credit award of \$5 million. Tax credit reservations were made in two MTHC Consortium communities with properties in Bartlesville and Coweta. New tax credit projects and amounts included \$376,885 for W-P GMC LP to buy and rehabilitate 76 apartments in Bartlesville to be called Willow Park Apartments and \$330,387 for the same entity to buy and rehabilitate 64 additional units in that same complex. Finally, \$575,193 was reserved for Summit Coweta Apartments LP to buy and rehabilitate 60 apartments to be called Coweta Apartments.

Public Housing Modernization (Comprehensive Grant Program)

Federal aid to public housing agencies (PHA's) to finance capital improvement in public housing developments with 250 or more units. Money can be used for capital improvements and related management improvements in public housing projects to upgrade living conditions, correct physical deficiencies, and achieve operating efficiency. The grant has recently become an annual capital fund award.

Public Housing Capital Fund Program (CFP)

Three MTHC Consortium locations have housing authorities that receive annual allocations from the Public Housing Capital Fund Program from the U.S. Department of Housing and Urban Development. The Fiscal Year 2012 CAP Fund Awards (Capital Fund Program CFP Amendments) are Bristow \$154,644; Drumright \$157,668; and

Osage County \$306,517. These funds help the public housing authorities provide improvements to their existing housing units.

Section 8 Existing Housing Certificate and Voucher Programs

Assists extremely low-income families in finding decent, safe, and sanitary housing in private accommodations. As of June 1, 2012, the Bristow Housing Authority administers Eighty-seven (87) Section 8 vouchers. Oklahoma Housing Finance Agency administers a total of 1,022 certificates and vouchers within the Consortium area. Of these, 478 are outside of Tulsa County.

STATE RESOURCES:

Housing Trust Fund

Established in 1998, the state appropriated \$2 million for the trust fund in order to leverage private and other public funds for the development of affordable housing. Funds can be borrowed at below-market rates to assist in new construction of rental and home-ownership units, conversion, acquisition or rehabilitation of affordable housing or infrastructure needs that are essential to the development of affordable housing. As of March 31, 2012, the Oklahoma Housing Finance Agency (OFHA) reports that total funds available in the Housing Trust Fund are \$2,798,166. There are rural allocations (counties with less than 490,000 population) \$3,060,974 (Minimum) and \$3,531,894 (Maximum) and urban allocations (Oklahoma County and Tulsa County) \$1,177,298 (Minimum) and \$1,648,217 (Maximum). Eligible applicants include for-profit developers, non-profit organizations, units of local government, Indian Tribes, and political subdivisions.

LOCAL RESOURCES:

HOME Match

Each participating jurisdiction receiving HOME funds is required to provide a 25% match. That match may be in the form of direct subsidies, infrastructure improvements in the targeted area and/or the waiving of related construction fees. Currently, the MTHC has available over \$2 million in banked match to apply towards HOME projects within the service area.

PRIVATE

United Way

Provides funding for a variety of social service activities. A total of \$19,000,000 (FY 2012) is available through their application cycle. Housing is only incidentally funded through the United Way; a portion of their funds is typically awarded to supportive service agencies that provide housing assistance. Recent Tulsa Area United Way Community Investments in MTHC Consortium area communities totaled \$3,149,869.

Conventional Lenders

Within the Consortium are many lending institutions that are committed to supporting the development and preservation of affordable housing and meeting the credit needs of low and moderate-income households.

Affordable Housing Program

The Federal Home Loan Bank of Topeka recently awarded \$450,000 in AHP funds for Oakland Place, the third elderly congregate housing project to be located in Broken Arrow.

Annual Objectives 91.220(c)(3)

**If not using the CPMP Tool: Complete and submit Table 3A.*

**If using the CPMP Tool: Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls*

Goals and objectives to be carried out during the action plan period are indicated by placing a check in the following boxes.

<input type="checkbox"/>	Objective Category: Decent Housing Which includes:	<input type="checkbox"/>	Objective Category: Suitable Living Environment Which includes:	<input type="checkbox"/>	Objective Category: Expanded Economic Opportunities Which includes:
<input type="checkbox"/>	assisting homeless persons obtain affordable housing	<input checked="" type="checkbox"/>	improving the safety and livability of neighborhoods	<input type="checkbox"/>	job creation and retention
<input type="checkbox"/>	assisting persons at risk of becoming homeless	<input type="checkbox"/>	eliminating blighting influences and the deterioration of property and facilities	<input type="checkbox"/>	establishment, stabilization and expansion of small business (including micro-businesses)
<input checked="" type="checkbox"/>	retaining the affordable housing stock	<input checked="" type="checkbox"/>	increasing the access to quality public and private facilities	<input type="checkbox"/>	the provision of public services concerned with employment
<input checked="" type="checkbox"/>	increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability	<input type="checkbox"/>	reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods	<input type="checkbox"/>	the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan
<input type="checkbox"/>	increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence	<input type="checkbox"/>	restoring and preserving properties of special historic, architectural, or aesthetic value	<input type="checkbox"/>	availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices
<input type="checkbox"/>	providing affordable housing that is accessible to job opportunities	<input type="checkbox"/>	conserving energy resources and use of renewable energy sources	<input type="checkbox"/>	access to capital and credit for development activities that promote the long-term economic social viability of the community

6. Provide a summary of specific objectives that will be addressed during the program year.

SPECIFIC OUTCOMES

Consolidated funds in the amount of **\$2,010,944** for the HOME Consortium and Urban County for the 2012 program year will be allocated among the following nationally reportable outcomes established by HUD:

	Availability/ Accessibility	Affordability	Sustainability
Create Suitable Living Environment	44%	0%	17%
Sapulpa- Street Improvements			\$134,888
Tulsa County- Street Improvements			\$69,097
Bixby- Drainage Improvements			\$54,853
Sand Springs- Sewer Improvements			<u>\$68,248</u>
Jenks- ADA Sidewalks	\$42,748		
Administration- CDBG	\$182,904		
Broken Arrow- Park Improvements	\$348,073		
Owasso- Sidewalk Improvements	\$113,845		
Skiatook- Senior Center Renovation	\$69,097		
Sperry- Fire Equipment	\$69,097		
BA Neighbors Outreach	\$16,756		
Margaret Hudson Counseling	\$11,805		
Child Abuse Network	\$15,000		
BA Seniors	\$12,567		
BA Neighbors Treetops Outreach	\$5,000		
Arrow Springs Elem. After School Tutors	<u>\$5,383</u>		
Total	\$892,275		\$327,086
Provide Decent Affordable Housing	4%	35%	0%
Innovative Housing Initiatives			
Elderly Rental Housing		<u>712,425</u>	
Administration- HOME	<u>79,158</u>		
Total	\$79,158	\$712,425	
Create Economic Opportunities	0%	0%	0%

Creating Suitable Living Environment: Availability/Accessibility

In the FY 2012 program year, five members of the Tulsa County CDBG Urban County will fund activities that will enhance the quality of life for specific populations within their jurisdictions. These activities will improve access to public services for seniors, disabled, and other low- and- moderate income residents, with the following specific outcomes:

- City of Broken Arrow- Park improvements to Central Park to construct new sports courts to provide improved recreational opportunities to serve residents of low and moderate income neighborhood.
- **Outcome:** Enhanced accessibility to recreational opportunities for 2,900 residents
- City of Owasso- Sidewalk installation and repair to ensure ADA compliant connections between low to moderate income residential neighborhoods and

essential services such as the post office, drug and grocery stores, and other businesses.

Outcome: Enhanced availability and accessibility for 1,181 persons

- City of Jenks- Sidewalk installation and repair to ensure ADA compliant connections between low to moderate income residential neighborhoods and essential services such as the post office, drug and grocery stores, and other businesses.

Outcome: Enhanced accessibility for 1,415 residents

- City of Skiatook- Renovations to an existing building for relocation of the Senior Center operation to provide city senior residents a more safe and secure facility for daily meals and activities.

Outcome: Enhanced availability and accessibility for 905 seniors

- Town of Sperry- Purchase of fire equipment to improve the health and safety of all Town residents by providing more adequate response and action in the event of an emergency and improve communications within the fire department.

Outcome: Enhanced availability and accessibility for 1,206 persons

In the FY 2012 program year, Broken Arrow will fund six public service agencies with CDBG funds that will make services available to low and moderate income persons and improve the quality of their living environment. These activities will improve access to public services for youth, seniors, disabled, and other low- and- moderate income residents in the City of Broken Arrow, with the following specific outcomes:

- Arrow Springs Elementary After School Tutoring:
Outcome: Increased reading/math skills of 40 students
- Broken Arrow Seniors:
Outcome: Increased access to services at senior center for 3,500 seniors
- Broken Arrow Neighbors Outreach/Advocacy Office:
Outcome: Advocacy/referral of services to 240 persons
- Broken Arrow Neighbors Outreach/Advocacy at Treetops Apartments:
Outcome: Advocacy services provided to 85 elderly/disabled clients
- Margaret Hudson Pregnant Adolescents Counseling:
Outcome: Counseling to 70 students and families
- Child Abuse Network:
Outcome: Forensic interviews of 90 allegedly abused children

Once completed, these public service activities will directly improve the living environment for more than 4,025 low- and-moderate income residents of Broken Arrow.

Creating Economic Opportunities: Availability/Accessibility

No projects funded with 2012 program year funds

Creating Suitable Living Environment: Affordability

No projects funded with 2012 program year funds

Providing Decent Affordable Housing: Affordability

One project to provide affordable housing units to low and moderate income households will be funded with FY 2012 HOME funds. The project involves the creation of affordable units through new construction or rehabilitation.

- HOME Construction of Elderly Congregate Apartments:
Outcome: Construction of 40 units of rental housing for low income Elderly.

The creation of 40 affordable units for low income households will be the result of these housing activities.

Creating Economic Opportunities: Affordability

No projects funded with 2012 program year funds

Creating Suitable Living Environment: Sustainability

In the FY 2012 program year, several municipalities in the Tulsa County CDBG Urban County will fund public facilities and improvements that sustain a suitable living environment. These activities will improve the quality and increase the quantity of public improvements, such as sewer and water line improvements, storm sewer improvements, and drainage improvements, with the following specific outcomes:

- City of Bixby- Phase 2 construction of new storm sewer in Original Townsite and Midland Addition to relieve localized flooding for the residents of the low income neighborhood:
Outcome: Improved quality of environment for 280 people.
- City of Sapulpa- Phase 5 of installation of storm drainage improvements to alleviate flooding of residential area:
Outcome: Improved quality of environment for 89 people.
- City of Sand Springs- Repair and replacement of existing deteriorated sewer lines in an area north of City Hall to improve infrastructure for residents of older neighborhood.
Outcome: Improved quality of environment for 1,116 residents
- Tulsa County-Unincorporated– Reconstruction and rehabilitation of all streets in the Scottsdale Addition in the Turley area of north Tulsa County to repair deteriorated streets to improve infrastructure for area residents of low income block group:
Outcome: Improved quality of environment for 1,683 persons.

Providing Decent Affordable Housing: Sustainability

No projects funded with 2012 program year funds

Creating Economic Opportunities: Sustainability

No projects funded with 2012 program year funds

HOUSING

Specific Housing Objectives

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

ACTION PLAN SPECIFIC OBJECTIVES AND STRATEGIES

HOME Consortium Funds: \$791,583

Construction of Elderly Congregate Housing	\$712,425
Administration	\$ 79,158

HOME Consortium funds in the amount of \$791,583 for the 2012 program year will be allocated among the following nationally reportable outcomes established by HUD:

	Availability/ Accessibility	Affordability	Sustainability
Create Suitable Living Environment	0%	0%	0%
Provide Decent Affordable Housing	0%	100%	0%
Elderly Rental Housing		\$712,425	
Total	\$0	\$712,425	
Create Economic Opportunities	0%	0%	0%

SPECIFIC OBJECTIVES AND STRATEGIES

HOUSING

Priority Need: Extremely low, Very low and Low Income Owner-occupied Households

Approximately three percent of all lower income households are experiencing housing problems not related to cost. By income groups, 181 extremely low, 191 very low, and 648 low income households are experiencing housing problems.

Strategy: Housing Rehabilitation Program

A moderate rehabilitation program for owner-occupied housing will provide an opportunity for homeowners to live in safe and sanitary housing. The program is structured as a low-interest or deferred loan based on annual income and household size. It is targeted to extremely low, very low, and low income households in the Consortium.

Goal: In FY 2012, the Consortium's Moderate Housing Rehabilitation program will again be re-assessed to determine the viability of continuing the program. Current limits of spending up to \$25,000 to bring units up to code are not adequate to ensure meeting HQS. No funds are budgeted for this activity in FY2012.

Priority Need: Very low and Low Income Renter Households

Fifty-four percent (54%) of the 11,815 very low income and 20% of the 7,192 low income households are experiencing a housing cost burden exceeding 30% of their income.

Strategy: Homebuyer Assistance

Many of these families are able to make monthly mortgage and utility payments, yet they lack initial funds necessary for down payment and closing costs. The Homebuyer Program is designed to provide assistance for those initial costs and facilitate home purchases for qualified families. Nonprofit partners provide homeowner education for these clients as well.

Goal: No funds are budgeted for this program in FY2012. A large appropriation of FY2010 funds was targeted to Homebuyer Assistance, and this amount is adequate to address current needs.

Priority Need: Extremely low Income Renter Households

Fifty-eight percent (58%) of all extremely low income renters are paying more than 30% of their monthly income on rent. Among household types, 49% of elderly, 62% of small related, 47% of large related, and 64% of all other households.

Strategy: Rental Assistance

Rental assistance through the Housing Vouchers offered by Public Housing Authorities and the Oklahoma Housing Finance Agency provide options for smaller households to secure decent, safe and sanitary housing within their income range.

Goal: The Consortium will support efforts to secure additional tenant-based rental assistance for eligible households in the area through Section 8 Housing Voucher programs.

Priority Need: Availability of Rental and Owner-occupied Housing

Vacancy rates among the consortium cities are generally decreasing and of the vacant units, a portion is uninhabitable. Decreasing available housing stock, increasing populations, renewed economic activity and higher housing costs create an increased demand for new and affordable housing.

Strategy: New Construction

Development of infill rental and owner-occupied housing on vacant lots.

Goal: To see 40 affordable rental units developed using public/private partnerships.

HOMELESS

Priority Need: Identify Level of Homelessness and Subpopulations

An accurate count of the number of homeless persons and subpopulations continues to be difficult yet agencies are experiencing significant demand under healthy economic conditions.

Strategy: Coordination with Homeless Services Network and Housing and Urban Development to Strengthen Efforts for Assessing Homeless

Estimates from the City of Tulsa and the State indicate there are rural homeless not accounted for in survey data. In recent years assessments have been conducted primarily within the City of Tulsa; however the City of Broken Arrow has participated in the *Point in Time* One-night Consumer Survey counts the last four years with the 2011 count held on January 27, 2011. Efforts are continuing to work with the Network and area agencies to develop an improved system.

Goal: Continue to support an improved count of the homeless and subpopulations within the Consortium and assist in the determination of the adequacy of existing shelters over the next three years.

OTHER SPECIAL HOUSING NEEDS

Priority Need: Extremely low, Very low and Low Income Elderly Rental and Owner Households

Eight Hundred Thirty (830) extremely low, 600 very low, and 159 of low income elderly renters are spending more than 30% of their income on rent. Among elderly owners, 2,143 of extremely low, 959 of the very low, and 940 of low income households are spending more than 30% of their income on housing expenses. As the cost of housing continues to rise, elderly incomes often remain virtually stable forcing more elderly to pay a greater percentage of their income on housing or move from their communities. This number is likely to increase as the population ages.

Strategy: Construction of congregate rental housing for the elderly

Most social service providers agree that housing and supportive services for the elderly go hand in hand. The provision of affordable rental housing and supportive services within one complex will allow the elderly to continue to lead independent or semi-independent life styles.

Goal: Provide a minimum of 40 affordable rental units for the elderly. Units will be targeted to the extremely low, low and moderate income groups. Sources of funding will include Consortium HOME funds, Low Income Housing Tax Credits, Federal Home Loan Bank and private lending institutions.

COMMUNITY DEVELOPMENT

Specific Non-Housing Objectives

3. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
4. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

CDBG funds in the amount of **\$1,219,361** for the Urban County for the 2012 program year will be allocated among the following nationally reportable outcomes established by HUD:

	Availability/ Accessibility	Affordability	Sustainability
Create Suitable Living Environment	44%	0%	17%
Sapulpa- Street Improvements			\$134,888
Tulsa County- Street Improvements			\$69,097
Bixby- Drainage Improvements			\$54,853
Sand Springs- Sewer Improvements			<u>\$68,248</u>
Jenks- ADA Sidewalks	\$42,748		
Administration- CDBG	\$182,904		
Broken Arrow- Park Improvements	\$348,073		
Owasso- Sidewalk Improvements	\$113,845		
Skiatook- Senior Center Renovation	\$69,097		

Sperry- Fire Equipment	\$69,097	
BA Neighbors Outreach	\$16,756	
Margaret Hudson Counseling	\$11,805	
Child Abuse Network	\$15,000	
BA Seniors	\$12,567	
BA Neighbors Treetops Outreach	\$5,000	
Arrow Springs Elem. After School Tutors	\$5,383	
Total	\$892,275	\$327,086

ACTION PLAN SPECIFIC OBJECTIVES AND STRATEGIES

COMMUNITY DEVELOPMENT

Priority Need: Sustainability of Community

Communities participating in the CDBG Urban County will seek to improve the quality and increase the quantity of public improvements for low income residents within their jurisdictions. During the period of the FY2012 Action Plan, infrastructure and neighborhood revitalization activities will be undertaken, such as storm sewer and water line improvements, sanitary sewer line extension, park improvements and ADA sidewalk accessibility.

Strategy: Construction of Public Improvements

Activities that will improve the quality and increase the quantity of public improvements, such as drainage improvements, water and sewer gravity lines, and sidewalks, and that improve the quality of residential areas through enhancements to neighborhood parks will be a focus of area communities.

Goal: Improvements to parks to improve neighborhoods; provide for construction of sanitary sewer and drainage improvements for 3,204 residents; and improved accessibility for 1,564 handicapped and elderly people.

Description of Activities 91.220(d) and (e)

**If not using the CPMP Tool: Complete and submit Table 3C*

**If using the CPMP Tool: Complete and submit the Projects Worksheets and the Summaries Table.*

7. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan, the number and type of families that will benefit from the proposed activities, proposed accomplishments, and target date for the completion of the activity.

Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability).

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROJECTS

City of Bixby

Original Township /Midland Addition Drainage Improvements

Location: 300 block of East Dawes, located between Parker St. and Riverview Rd. in central Bixby.

23-T17N-R13E

Phase 2 construction of new storm sewer on Parker St. between Dawes Ave. and the alley north of Needles Ave. to alleviate street flooding in area of Original Township and Midland Addition.

Census Tract/Block Group: 78.01.1

Number and Type of Beneficiaries: 280 low income households

L/M %: 53.9

Estimated Cost: \$54,853 in CDBG funds leveraged with \$37,857 in City funds

General objective category: Suitable living environment

General outcome category: Sustainability

Target Date for Completion: June 2013

City of Broken Arrow

Central Park Sport Court Construction

Location: 1500 S. Main Street

14-T18N-R14E

Demolition of existing tennis court facility and construction of four new sport courts, with lighting for courts to increase recreational opportunities for low income area residents.

Census Tract/Block Group: 75.03.1

Number and Type of Beneficiaries: 383 low income households

L/M %: 52.6

Estimated Cost: \$348,072 in CDBG funds leveraged with \$101,900 in City funds.

General objective category: Suitable living environment

General outcome category: Availability/accessibility

Target Date for Completion: December 2013

City of Jenks

Original Town ADA Sidewalk Improvements

Location: 2nd St. sidewalk (Main to Apache)- East Side; 3rd Street sidewalk (Main to Apache)

14-T18N-R14E

Phase 3 reconstruction of existing and construction of new sidewalks, ramps, and lighting along several streets in the original townsite to improve handicapped accessibility.

Census Tract/Block Group: 67.03.2

Number and Type of Beneficiaries: 500 elderly and/or disabled residents of original townsite.

L/M %: 100% handicapped

Estimated Cost: \$42,748 in CDBG funds leveraged with \$21,252 in City funds.

General objective category: Suitable living environment

General outcome category: Availability/accessibility

Target Date for Completion: April 2013

City of Owasso

Original Townsite Sidewalk Rehabilitation and ADA Compliance

Location: 4th St. N to 4th Ave. S., Atlanta Street to Cedar Street

S30-T21-R14

Repair, rehabilitation and installation of sidewalks, curbs and gutters in the original townsite neighborhoods to improve the quality of pedestrian safety and access in the neighborhood. Sidewalks and intersections will be made ADA compliant for disabled residents.

Census Tract/Block Group: 58.01/BG 1, 2

Number and Type of Beneficiaries: 1,181 low income persons

L/M %: 77.1%

Estimated Cost: \$113,845 in CDBG funds

General objective category: Suitable living environment

General outcome category: Availability/accessibility

Target Date for Completion: June 2013

City of Sand Springs

Old Town Sanitary Sewer Rehabilitation

Location: Neighborhoods north of City Hall

S11-T19N-R11E

Repair and replacement of existing deteriorated sanitary sewer lines in an area north of City Hall.

Census Tract/Block Group: 93.00.3

Number and Type of Beneficiaries: 1,116 low income persons

L/M %: 71.3

Estimated Cost: \$68,248 in FY2012 CDBG funds

General objective category: Suitable living environment

General outcome category: Sustainability

Target Date for Completion: June 2013

City of Sapulpa

Cleveland Avenue Reconstruction Phase 5

Location: Cleveland Ave. from Adams Street to Boyd Streets

S36-T18N-R11E

Remove and reconstruct street pavement including aggregate base, asphalt pavement, concrete curb and gutter, and incidental storm sewer improvements.

Census Tract/Block Group: 213.00.2

Number and Type of Beneficiaries: 89 low income households

L/M %: 97.1%

Estimated Cost: \$134,888 in CDBG funds leveraged with \$289,441 in City funds.

General objective category: Suitable living environment

General outcome category: Sustainability

Target Date for Completion: October 2012

Town of Skiatook

Renovation of Building for Senior Center Relocation

Location: 810 South Osage

S26-T22N-R12E

Renovations to an existing building to be used for a Senior Center.

Census Tract/Block Group: 102.01.2

Number and Type of Beneficiaries: Presumed Benefit to 905 seniors.

L/M %: 100% (Presumed Benefit)

Estimated Cost: \$69,097 in CDBG funds leveraged with \$20,903 in Town funds.

General objective category: Suitable living environment

General outcome category: Availability/Accessibility

Target Date for Completion: February 2013

Town of Sperry

Fire Equipment Purchase

Location: 7301 West 113th Street North

S13-T21N-R12E

Purchase of fire equipment to improve the health and safety of all Town residents by providing more adequate response and action in the event of an emergency and improve communications within the fire department.

Census Tract/Block Group: Entire L/M Town

Number and Type of Beneficiaries: 1,206 low income persons

L/M %: 62.87%

Estimated Cost: \$69,097 in CDBG funds leveraged with \$13,880 in Town funds.

General objective category: Suitable living environment

General outcome category: Availability/accessibility

Target Date for Completion: October 2012

Tulsa County

Scottsdale Addition in Turley area in north Tulsa County

Location: Wheeling Ave. to Xanthus Ave.; 62nd Pl. N. and 61st St. N.

S6-T20N-R13E

Remove and reconstruct street pavement including pavement patching and replacement of 6" curb and gutter, where needed, and micro surfacing of the entire addition streets.

Census Tract/Block Group: 91.04.2

Number and Type of Beneficiaries: 268 low income households

L/M %: 58.5%

Estimated Cost: \$69,097 in CDBG funds leveraged with \$50,903 in County funds.

General objective category: Suitable living environment

General outcome category: Sustainability

Target Date for Completion: February 2013

HOME Program

Rental Housing for the Elderly

The Consortium will assist elderly households through the allocation of \$712,425 to CHDOs and non-profit sponsors for new construction and/or historic rehabilitation of elderly congregate housing. FY2012 HOME funds will be leveraged with other funds including private financing, tax credit proceeds and Affordable Housing Funds (AHP) through the Federal Home Loan Bank (FHLB). Match credit will be secured through waived fees associated with the project as well as AHP funds. The Consortium will issue a Request For Proposal in July 2012 for prospective projects. Proposals will be evaluated according to the following criteria, as well as HUD's new FY2012 Underwriting criteria:

- Documentation of need
- Ability to leverage HOME funds
- Capacity of development team
- Extent of long-term affordability
- HOME cost per unit

- Provision of support services
- Community support
- Generation of match
- Readiness to proceed

The Cities of Jenks, Coweta, Sapulpa, Broken Arrow, Collinsville, Bixby, Skiatook, Bristow, Glenpool, Owasso and Sand Springs were previously selected as the sites for construction of elderly housing during fiscal years 1995-2010. The complexes which are open for occupancy generally enjoy an average of 100% occupancy. Award of FY2006 funds for the construction of an elderly complex, The Wells Building, in downtown Sapulpa was made in July, 2008, with construction completed in December 2010. Award of FY2007/2008 funds was made in December 2008 for a second elderly complex in Broken Arrow, Kenosha Landing. Construction was completed in May 2011. In June 2011, HOME funds were awarded to and a CHDO reservation made to Vintage Housing for a third complex in Broken Arrow, Oakland Place. This project is awaiting tax credit award from OHFA.

Owner-Occupied Housing Rehabilitation

This program is designed to serve low to moderate-income households. The FY 2012 funding allocation will be in the amount of \$0. The Consortium will assess the continued viability of the Moderate Rehabilitation program because of the increasing cost to bring units into compliance with Housing Quality Standards within the \$25,000 limit. Options will be considered, including training area rehabilitation contractors in Lead Based Paint Abatement in order to increase the maximum rehabilitation limit above \$25,000. The Consortium generally gives priority consideration to those cities and counties that do not have active HOME-funded owner occupied housing rehabilitation programs. The maximum per unit investment is \$25,000 in HOME funds. Future priority areas include: the Cities of Glenpool, Jenks, and the unincorporated areas of Osage, Rogers, Wagoner, and Washington Counties. The Consortium will also consider additional criteria prior to awarding funds for the housing rehabilitation program. Those factors are as follows:

- Ability to provide matching funds,
- Selection of target area within city/county boundaries,
- Lender participation.

HOMEBUYER ASSISTANCE

This program is designed to assist low to moderate-income persons throughout the Consortium's jurisdiction. Funding has been allocated to one sub-recipient to serve the entire Consortium's service area. Funds have previously been awarded to Community Action Resource and Development (CARD) to conduct Homebuyer Assistance throughout the Consortium area. Previous year funding allocations have been fully utilized. The FY10 funding amount of \$300,000 was allocated to CARD for this activity. This amount is sufficient to address current homebuyer assistance levels and no FY 2012 funds will be allocated to this activity.

Geographic Distribution/Allocation Priorities 91.220(d) and (f)

8. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
9. Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

The Metropolitan Tulsa HOME Consortium, formed in 1994, consists of 24 member governments in the northeastern part of Oklahoma. There are six county governments: Tulsa, Creek, Osage, Rogers, Wagoner, and Washington Counties. The eighteen cities range in size from the largest member Broken Arrow to the smallest member Sperry. The total 2010 population of the MTHC Consortium area is 501,535. HOME funds are targeted to low to moderate income households or individuals for all housing programs conducted by the Consortium.

The HOME Consortium staff conducts Needs Assessment Public Hearings at various locations in the MTHC each year. A Needs Public Hearing was held at Tulsa County on March 26, 2012. The MTHC Policy Committee reviews all proposals for housing programs and makes recommendations to Tulsa County, the lead agency. The Housing Rehabilitation Program is conducted in targeted residential neighborhoods in MTHC cities that are awarded HOME funds through a RFP process conducted by Tulsa County. The housing rehabilitation program is rotated among the various member governments of the Consortium. The City of Broken Arrow receives an annual allocation for housing rehab from the MTHC Consortium. The Homebuyer Assistance program is operated throughout the 6-county Consortium area by a MTHC subrecipient and it serves low to moderate income persons/households in all areas. The locations of the new Elderly Congregate Housing projects are determined by market studies conducted by the CHDO applying for funding. Innovative Housing new construction is determined by each CHDO's analysis of the area real estate market and the CHDO's housing strategy and mission.

The Tulsa County Community Development Block Grant Urban County with eleven member governments was formed in 2008. Tulsa County is the lead entity. The CDBG Urban County consists of the unincorporated areas of Tulsa County and ten Tulsa County communities. The City of Broken Arrow, a former CDBG Entitlement, receives an annual allocation from the Urban County program. The City of Broken Arrow will continue to use funds in target areas encompassing the original town site, to administer a comprehensive neighborhood improvement program. The Cities of Bixby, Jenks, Owasso, Sand Springs, and Sapulpa receive funding allocations as Metro Cities, similar to their prior status under the State of Oklahoma Small Cities CDBG program. The remaining cities of Collinsville, Glenpool, Skiatook, and Sperry, along with Tulsa County are in a competitive cities category. All members of the Urban County establish their own priorities for use of CDBG funds, and determine which activities they wish to fund.

Annual Affordable Housing Goals 91.220(g)

Table 3B Annual Housing Completion Goals

Grantee Name: Tulsa County HOME Consortium Program Year: 2012	Expected Annual Number of Units To Be Completed	Actual Annual Number of Units Completed	Resources used during the period			
			CDBG	HOME	ESG	HOPWA
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)						
Homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)						
Acquisition of existing units			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	40		<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	40		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)						
Acquisition of existing units				<input type="checkbox"/>		
Production of new units			<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units			<input type="checkbox"/>	<input type="checkbox"/>		
Homebuyer Assistance			<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS						
Annual Rental Housing Goal	40		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	40			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

One Year Affordable Housing Goals

Rental Assistance: New construction of 40 units of elderly apartments.

Public Housing 91.220(h)

11. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
12. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Action Plan Public Housing Strategy response:

Tulsa County and the Cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Sapulpa, Skiatook, and Sperry do not operate Public Housing Authorities and there are no public housing units within those cities or within the county. As such, there is no "troubled" public housing agency in those locations and they have no obligation to describe the manner in which they will provide financial or other assistance in improving its operations to remove such designation during the next year.

There are three public housing authorities located within the MTHC Consortium area:

Bristow Public Housing Authority operates 159 units.

Drumright Public Housing Authority operates 148 units.

The Osage County Housing Authority has 282 units at six locations in the county:

- Barnsdall
- Cedar Ridge
- Fairfax
- Hominy
- Osage
- Shidler

None of these agencies is designated as "troubled" by HUD and the Consortium has no obligation to describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

The housing units at all three locations are in excellent condition. In addition to the public housing units at Bristow, the Bristow Housing Authority administers 87 Section 8 vouchers. All three housing authorities received FY 2012 Capital Fund (CFP) grants for maintenance and improvements to their units.

- Bristow \$154,644
- Drumright \$157,668
- Osage County \$306,517

Coordination between the Homebuyer Assistance subrecipient agencies and the Consortium's three Public Housing Authorities will provide targeted outreach to residents and tenants for the purpose of ensuring that the Homebuyer Assistance funds may be used to provide downpayment assistance for these residents.

Homeless and Special Needs 91.220(i)

13. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.
14. Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).
15. Homelessness Prevention—Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Action Plan Special Needs response:

The Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County do not receive federal funding for homeless services and programs; therefore they do not provide housing and related services for the homeless.

Tulsa County and the cities of Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Skiatook, and Sperry are part of the Tulsa County Continuum of Care. An INCOG staff person participates in the monthly meetings of COC Steering Committee and the Homeless Services Network. The agencies that receive Continuum of Care funding and the shelters that receive ESG-Emergency Shelter Grants serve clients from the City of Tulsa and from Tulsa County and the communities identified above. Specific information on the Tulsa County Continuum of Care process can be found in the FY 2010-2012 Strategic Plan.

Barriers to Affordable Housing 91.220(j)

16. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Action Plan Barriers to Affordable Housing response:

There are several complex factors which prevent lower income households from obtaining affordable housing. Many of these factors are influenced by elements which are beyond the control of government. These factors include; economic conditions, interest rates, labor and material cost, wage levels, and non local tax policies.

We should encourage our 24 local governments to look at factors such as land use and development regulations, development fees and building codes that may not be conducive to promote affordable housing.

Cities and counties in the Consortium all participate in the promotion of fair housing within their communities. All 24 local governments are current or former recipients of CDBG funds and have conducted activities to promote fair housing. Such activities have included promoting April as Fair Housing Month, adopting or updating local Fair Housing Ordinances and making available a Fair Housing Brochure.

Other Actions 91.220(k)

17. Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

18. Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

Lead-based Paint

The Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County programs will continue to follow current guidelines and regulations concerning lead-based paint that apply to existing structures constructed prior to 1979. Specific details of this action can be found in the FY 2010-2012 Strategic Plan section concerning lead-based paint.

Antipoverty Strategy

Several agencies, including all of the Community Action Agencies are implementing programs designed to minimize the number of persons at or below poverty. The various programs offered are listed below.

Head Start: provides comprehensive services in health/nutrition, parent involvement, disabilities, family literacy, social services and education.

Weatherization Program: provides energy related cost cutting measures in older homes.

Community Outreach and Development: increases the level of self-sufficiency for low-income individuals and groups through development of the self-help and management skills needed to operate effectively. Services include In-home care, educational programs, community organization, information and referral and community networking.

Youth Programs: designed to create employment and training opportunities for low income youths.

Homeless Program: provides financial assistance, case management, counseling and available resources to individuals and families who are homeless or at risk of being homeless.

Emergency Assistance: provides food, shelter, utility assistance, clothing, medical treatment and support for individuals and families in emergency situations.

Economic Development; offers employment/ career counseling and training, assistance in business development and an entrepreneurial development support system.

Senior Nutrition and wellness program: offers meals, transportation and social activities to area senior citizens.

Referral system: an extensive referral system which contains information on employment, housing services, emergency services, lists of other social service agencies and the services they provide.

Institutional Structure

In FY 2012 the Metropolitan Tulsa HOME Consortium (MTHC) will continue to provide the basic housing programs that the Consortium has administered since 1994. Tulsa County will continue as the lead entity for the Consortium. The MTHC Policy Committee will provide recommendations on future projects to the INCOG staff and to Tulsa County. Funding for specific Consortium programs will be allocated through a RFP process.

In FY 2012, Tulsa County will continue as the lead entity of the Tulsa County CDBG Urban County. The County will contract with the 10 other members of the Urban County to fund their activities. The CDBG Urban County Policy Committee, comprised of representatives of the 11 member jurisdictions, will provide policy guidance to administrative staff. Designated Metro Cities will receive a set-aside formula allocation of funds; jurisdictions in the Competitive category will respond to a RFP for funding selection. A Policy and Procedure Manual has been developed for the Urban County.

Enhance Coordination

Tulsa County serves as the lead entity for both the Metropolitan Tulsa HOME Consortium and the Tulsa County CDBG Urban County. The HOME Consortium and the Tulsa County CDBG Urban County entitlement grants are both administered by the staff of the Indian Nations Council of Governments (INCOG).

The INCOG staff conducted needs assessment public hearings at various locations in the Consortium service area and in the Tulsa County CDBG Urban County and developed the plan in accordance with input from the hearings.

The MTHC Policy Committee is comprised of appointees from the 24 member governments in the Consortium. These members include county commissioners, city clerks, city managers, city planners, housing authority directors, financial lenders, real estate professionals, and other government appointees from the six-county area. The staff receives information from the local Community Action Agencies that also serve as the Consortium's CHDO's and subrecipients. These agencies have direct contact with the public as they provide services to children, the elderly, the disabled, and to low to moderate income households and individuals. Vintage Housing Inc. does an extensive market survey that examines the housing needs of the elderly in the general area of each community where they plan to locate an elderly congregate housing project. A Consortium staff member serves on the Tulsa County Continuum of Care Steering Committee and also attends the monthly meetings of the Homeless Services Network. These coordination efforts will continue during the next year to ensure that housing and community development needs are addressed in the service area.

A Policy Committee has been created for the Tulsa County CDBG Urban County. Representatives from Tulsa County, Bixby, Broken Arrow, Collinsville, Glenpool, Jenks, Owasso, Sand Springs, Sapulpa, Skiatook, and Sperry have been appointed to serve on this committee that will make determinations on the future use of CDBG funds.

Monitoring

The INCOG staff monitors Tulsa County HOME Consortium sub recipients and Tulsa County CDBG Urban County subgrantees on an annual basis to ensure that the sub recipients and subgrantees comply with all federal regulations and requirements governing their administrative, financial, and program operations. At the beginning of the program year, the INCOG staff develops Monitoring Plans for both the HOME and CDBG programs, evaluating each of the sub recipients and subgrantees resources against their needs and capacity. The Monitoring Plans identifies any "at-risk" sub recipients /subgrantees that may require in-depth reviews. The Monitoring Plans set schedules for on-site monitoring visit(s) and provides for a standardized procedure for all monitoring reviews. INCOG staff conducts on-site monitoring visits during the program year at each of the recently funded sub recipients in order to inspect program files, records, and related information. If necessary, the INCOG staff may require additional on-site monitoring visits.

HUD's CDBG Timely Expenditure of Funds ratios will be carefully monitored by staff in the FY2012 Program Year to insure subgrantees continue to expend awarded allocations quickly.

For the FY 2012 CDBG program, the County will undertake the following actions to ensure CDBG funds are drawn quickly by the Urban County jurisdictions:

- Metro City applications received and approved by County March 2012;
- Competitive Cities applications due June 1, 2012 to County;
- Environmental Review process for each project initiated July 2012;
- Contracts between County and jurisdictions executed by September 2012 (dependent upon date of County-HUD Funding Agreement);
- Insert clause in each jurisdiction's contract with County:

“III. Performance Measurement

The project must be under construction with a Notice To Proceed issued no later than 180 days from the date of approval of this contract by the County. Failure to commence construction within the timeframe may result in withdrawal of CDBG funds by the County for noncompliance of timely expenditure of funds.”

INCOG Staff will be in close contact on a biweekly basis with the staff responsible for CDBG projects in each jurisdiction to assess project progress, and offer technical assistance to move projects along. Additionally, INCOG Staff has initiated the development of a Monitoring Handbook and Checklist describing the standards and procedures used to monitor activities. The Handbook will be completed by September 2011 and used to monitor activities immediately.

Below are the Monitoring Plans developed for the HOME and CDBG programs:

FY 2012 CDBG SubGrantee Monitoring Plan

GENERAL INFORMATION

Grantee: Tulsa County CDBG Urban County	Period: FY 2012	(8/1/12 to 7/31/13)
Subject: CDBG SubGrantees	Contact:	INCOG - Claudia Brierre
SubGrantees Include: 11 Members of TC Urban County		
City of Broken Arrow (plus 8 Public Service subrecipients)		
City of Bixby		
City of Jenks		
City of Owasso		
City of Sand Springs		
City of Sapulpa		
City of Collinsville		
City of Glenpool		
City of Slaton		
Town of Sperry		
Tulsa County Unincorporated		

MONITORING OBJECTIVES

Primary:	To ensure that SubGrantees are complying with all applicable regulations and requirements under the CDBG Program governing their administrative, financial and programmatic operations
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To ensure that SubGrantees achieve their contracted performance objectives within schedule and budget, performing and delivering services in a timely manner

Secondary: To identify areas and take appropriate actions when performance problems arise.

RISK ASSESSMENT

Urban County administrative staff will annually perform a risk assessment to identify which SubGrantees require comprehensive monitoring, and assign a ranking to each SubGrantee.

Factors: SubGrantees new to the CDBG program; SubGrantees experiencing turnover of key grant administration staff; SubGrantees with past compliance or performance problems; SubGrantees undertaking multiple activities for the first time; SubGrantees conducting high risk activities such as acquisition or economic development.

- Ranking:
1. High Risk (staff turnover in key CDBG roles)
 2. High Risk (new to CDBG program)
 3. High Risk (acquisition or economic development activities)
 4. High Risk (past performance issues, including timely expenditure of funds)
 4. Moderate Risk (multiple activities)
 5. Moderate Risk (new financial tracking program)
 6. Low Risk (experienced subgrantees with demonstrated success in carrying out activities)
 7. Low Risk (e.g. public services activities)

SCHEDULE

Visits: August 2012	Sapulpa (Low Risk- demonstrated success; monitoring of completed project)
September 2012	Sand Springs (High Risk- timely expenditure of funds) Owasso (High Risk- staff turnover in key CDBG roles) Broken Arrow (High Risk for timely expenditure of funds; Moderate Risk for multiple activities) Bixby (Moderate Risk- construction of infrastructure)
November 2012	Jenks (High Risk- timely expenditure of funds) Skiatook (Moderate Risk- multiple activities) Glenpool (Low Risk- demonstrated success; monitoring Completed project) Collinsville (High Risk- timely expenditure of funds) Sperry (Moderate Risk- multiple activities) Tulsa County uninc. (Low Risk- demonstrated success) Broken Arrow Public Services Subrecipients (Low Risk)

PROCEDURES

- Step #1 Prepare for on-site monitoring visit of individual SubGrantees by studying rules and reviewing materials, including:
- a. Subgrantee application for funding
 - b. Written agreement

- c. Progress reports
 - d. Draw-down requests
 - e. Correspondence
 - f. Previous monitoring reviews
 - g. Copies of audits
- Step #2 Conduct visit as follows:
- a. Notify entity of date, scope, focus of review
 - b. Hold entrance conference with chief official or agency staff
 - c. Document, gather, and analyze files
 - d. Hold exit conference to report results, hear reaction, & form conclusions
- Step #3 Follow-up with letter that both compliments program and raises any finding/concerns

COMPLIANCE MONITORING

**Compliance with requirements of the CDBG Regulations is the responsibility of the Grantee.*

- These compliance monitoring procedures apply to subgrantees who have received allocations of Urban County funds under the CDBG Regulations. The compliance monitoring procedures and requirements are as follows:
- A. The TC Urban County/INCOG staff will verify compliance with National Objective funded and verify project met 51% LMI regulation by viewing income surveys and determination of LMI beneficiaries served.
 - B. The TC Urban County/INCOG staff will verify that the subgrantee complies with financial statutory requirements, including accounting for all monies received by fund and account; segregation of Federal funds separately from other funds; execution of a Non-Collusion Affidavit for payments in excess of \$25,000; and use of purchase orders.
 - C. The TC Urban County/INCOG staff will verify the subgrantee's compliance with applicable procurement and construction regulations.
 - D. During programmatic monitoring activities, the TC Urban County/INCOG staff shall review the subgrantee's affirmative marketing, minority outreach, and fair housing activities to ascertain compliance with standards established by HUD's Fair Housing Office.
 - E. The TC Urban County/INCOG staff will verify that the records documenting compliance with the CDBG Regulations for each year are retained for the entire grant period.

FY 2012 SubRecipient Monitoring Guide

GENERAL INFORMATION

Grantee: Tulsa County HOME Consortium	Period: FY 2012	(8/1/12 to 7/31/13)
Subject: HOME Subrecipients & CHDO's	Contact: INCOG -	Claudia Brierre Steve Boettcher

MONITORING OBJECTIVES

Primary:	To ensure that Subrecipients and CHDO's (Community Housing Development Organizations) are complying with all applicable rules under the HOME Program, especially financial management standards
	To confirm that Subrecipients and CHDO's are performing and delivering services in a timely manner
Secondary:	To identify areas where technical assistance may be offered to build capacity with operating assistance

PROCEDURES

Step #1	Prepare for visit by studying rules and reviewing materials
Step #2	Conduct visit as follows: a. Notify of date, scope, focus of review b. Hold entrance conference with chief official c. Document, gather, and analyze d. Hold exit conference to report results, hear reaction, & form conclusions
Step #3	Follow-up with letter that both praises and raises any finding/concerns

COMPLIANCE MONITORING

**Compliance with requirements of the HOME Regulations is the responsibility of the grantee.*

<p>These compliance monitoring procedures apply to all buildings placed in service in the Metropolitan Tulsa HOME Consortium (MTHC) area, which have received allocations of HOME funds determined under the HOME Regulations. The compliance monitoring procedures and requirements are as follows:</p> <p>A. The MTHC staff will verify that the owner of a low-income housing project is maintaining records for each qualified low-income unit/building in the project. These records must show, for each year in the compliance period, the information required by the record-keeping provisions contained in the HOME Regulations, incorporated herein by reference.</p> <p>B. The MTHC staff will verify that the records documenting compliance with the HOME Regulations for each year as described in Paragraph A above are retained for the entire affordability period.</p>
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C. The MTHC staff will inspect 100% of the HOME projects as prescribed by HUD regulations and will inspect the low-income certification, the documentation the owner has received to support that certification, and the rent records in those projects. For home ownership projects, the MTHC staff will inspect the documentation the grantee has received to support the eligibility of the homebuyers, and the liens, mortgages, or covenants filed to protect the period of affordability.

D. The owner must allow the MTHC staff to perform an on-site inspection of any low-income building in the project through the end of the compliance period. This inspection may be separate or in conjunction with any review of tenant files under Paragraph C and will include habitability requirements.

E. The MTHC staff will promptly notify the owner in writing if the MTHC staff is not permitted to inspect and review as described in Paragraphs C and D, or otherwise discovers that the project does not comply with the HOME Regulations. In such event, the owner will be allowed a correction period to supply missing documentation or to correct noncompliance. This correction period begins the earlier of (1) the date the notification is mailed or (2) the date of the inspection.

F. The MTHC staff will notify HUD of an owner's noncompliance or failure to certify no later than 45 days after the end of the time allowed for correction and no earlier than the end of the correction period.

G. During programmatic monitoring activities, the MTHC staff shall review Program contractor's affirmative marketing, minority outreach, and fair housing activities to ascertain compliance with standards established by HUD's Fair Housing Office.

H. Compliance with requirements of the HOME Regulations is the responsibility of the grantee. The MTHC obligation to monitor for compliance with the requirements of the HOME Regulations does not make the MTHC liable to any owner or to any shareholder, officer, director, partner, member, or manager of any owner or of any entity comprising any owner for an owner's non-compliance therewith.

RISK ASSESSMENT

Factors: Subrecipients or CHDO's undertaking multiple activities; conducting rental housing or economic development projects; being lead by new management

Ranking:

1. High Risk (e.g. multiple activities of rental housing and economic development)
2. High Risk (e.g. rental housing)
3. High Risk (e.g. new management)
4. Moderate Risk (e.g. homeownership program)
5. Moderate Risk (e.g. new computer program)
6. Low Risk (e.g. on-going job placement program)
7. Low Risk (e.g. public services activities)

SCHEDULE

Visits:	November 2012 & June 2012	Uptown Sapulpa, Inc. (High Risk); annual inspection of rental units
	June 2013	CARD (Moderate Risk)
	June 2013	Vintage Housing (Moderate Risk); annual inspection of all rental units
Desk Reviews:		none
Sub recipients Include: Elderly Congregate Housing Projects (Vintage Housing & Uptown Sapulpa, Inc.) Innovative Housing Projects (CARD = CHDO) HBA-Homebuyer Assistance (CARD = Sub recipient)		

Public Transportation Coordination

The HOME Consortium service area and the Urban County CDBG municipalities generally fall within the Tulsa Transportation Management Area (TMA). The administrator of the HOME and CDBG programs for Tulsa County, INCOG, was designated by the governor of Oklahoma as the Metropolitan Planning Organization (MPO) for the Tulsa region in accordance with federal law. As the MPO, INCOG, in cooperation with the Oklahoma Department of Transportation (ODOT) and Metropolitan Tulsa Transit Authority (MTTA), is responsible for the development of regional transportation plans and programs for the Tulsa Transportation Management Area (TMA). INCOG staff administering the HOME and CDBG programs consults with the regional transportation plans and programs to seek transportation grant opportunities for member communities, particularly those communities which have elderly housing developments funded through the HOME program. The market analysis for proposed elderly housing developments is examined to determine the availability or proximity of the site to public transportation. In several instances, the member community has provided transportation services directly to the elderly complex.

PROGRAM SPECIFIC REQUIREMENTS

CDBG 91.220(I)(1)

1. Identify program income expected to be received during the program year, including:
 - amount expected to be generated by and deposited to revolving loan funds;
 - total amount expected to be received from each new float-funded activity included in this plan; and
 - amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

No program income is expected to be generated during the program year. No activities which would generate program income will be undertaken. There is no program income from prior year projects for the same reason.

2. Program income received in the preceding program year that has not been included in a statement or plan.

No program income received from CDBG activities.

3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.

No Section 108 loan guarantees awarded.

4. Surplus funds from any urban renewal settlement for community development and housing activities.

Not applicable to the Urban County.

5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

No funds returned to line of credit.

6. Income from float-funded activities.

Not applicable.

7. Urgent need activities, only if the jurisdiction certifies.

No urgent need activities funded.

8. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income.

100% of CDBG funds will be used for activities that benefit persons of low and moderate income.

HOME 91.220(I)(1)

1. Describe other forms of investment. (See Section 92.205)
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254.

Guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

Assistance Available:

Up to fifty percent (50%) of the down payment and closing expenses not to exceed \$3,500. The Contractor shall counsel all applicants on the issue of lead-based paint hazards.

Terms and Conditions:

Self-amortizing five (5) year zero percent (0%) interest loans with a due on sale clause secured by a mortgage instrument (1/5 of loan forgiven each year of occupancy to encourage neighborhood stability). ***Loan funds returned by Homebuyers shall be forwarded to the Metropolitan Tulsa HOME Consortium and shall be retained in a HOME fund account for redistribution to other HOME eligible projects.***

2. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).

Not applicable; activity not funded.

3. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4).

Guidelines for resale or recapture as required in § 92.254 of the HOME rule.

Resale Restriction:

Home buyer shall repay a prorated share of HOME funds if property is sold prior to the five (5) year agreed-upon time period ***with funds returned to the Consortium as described in item (2) above.***

Recapture of HOME Investment:

No restriction on subsequent buyer. HOME Investment Funds subject to recapture shall be derived from net proceeds at the time of sale. If net proceeds are insufficient the repayment obligation will be reduced.

- a) A deed restriction or covenant running with the land should incorporate this requirement;
- b) The loan documents (Promissory Note) between the purchaser and the contractor shall incorporate this requirement.

4. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program.

If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

Not applicable; no TBRA funded.

5. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.

None.

6. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.

Tulsa County, as lead entity for the Metropolitan Tulsa HOME Consortium, and as required by the HOME regulations at 24 CFR Part 92.351, has established procedures and requirements for HOME-assisted rental and homebuyer housing projects containing 5 or more housing units. These procedures are designed to further the Consortium's policy of providing equal access to housing for protected classes, prohibiting discriminatory housing practices among owners of Consortium-assisted housing, and to further the objectives of Title VIII of the Civil Rights Act of 1968 and the Fair Housing Amendment Act of 1988.

The steps outlined below apply to all HOME-assisted rental and homebuyer housing projects containing 5 or more units. The steps include:

1. Informing the public, owners, and potential tenants about federal fair housing laws and the Consortium's affirmative marketing policy:

- Tulsa County HOME Consortium will inform owners, developers, and sponsors who will participate in Consortium programs of the Consortium's Affirmative Marketing Policy requirements.
- Tulsa County HOME Consortium will provide a copy of the Affirmative Marketing Policy and other fair housing documents to all owners, developers, and sponsors participating in Consortium housing programs.
- Owners/managers must submit their Affirmative Marketing Plan for specific developments for review and approval for consistency with the Consortium's Affirmative Marketing Policy.
- Local governments participating in Consortium activities will continue to educate the public about fair housing laws through their Fair Housing Brochures, flyers and other activities, including observing "April as Fair Housing Month".

2. Informing persons of all racial, ethnic and gender groups of unit availability:

- The HOME Consortium will inform the public of unit availability by issuing a special news release on the development to newspapers of general circulation.
- The Development owner/manager will make information about unit availability known by:

- i. Advertising to the public in newspapers of general circulation in the primary market area served by the proposed development;
- ii. Advertising in specialized newspapers, newsletters, etc., in cases where the development is designed for special populations;
- iii. Notifying appropriate Public Housing Authorities and requesting the PHA to inform eligible certificate holders and applicants on its Section 8 waiting list about unit availability;
- iv. Creating and distributing circulars, flyers or brochures

All written advertisements must use the Equal Housing Opportunity logotype.
All verbal advertisements must use the Equal Housing Opportunity slogan.

3. Informing and soliciting applications for persons in the housing market area who are not likely to apply for housing without special outreach.

- Upon determining project location, the Consortium will identify hard-to-reach populations and notify the owner/manager of organizations serving these groups
- It will be incumbent to the owner/manager to inform those groups (i.e. churches, social service organizations) of unit availability, tailoring their marketing methods to effectively inform their audience of unit availability.
- Special outreach must take place at the same time of notification to the general public.

4. Records

The owner/manager is required to retain the following records:

- Copy of owner/manager's proposed marketing plan;
- Copies of all advertisements placed in newspapers, magazines, general announcements, etc.
- Copies or list of all fair housing materials that have been distributed and are available within the complex or units;
- Dates and contracts in conducting special outreach through churches, organizations, civic or special interest groups, etc.

The Tulsa County HOME Consortium will monitor the actions of the owner/manager on a periodic basis to ensure the Affirmative Marketing Plan is being implemented.

5. Assessing Actions

To determine if good faith efforts have been made, the Consortium will:

- Compare the information contained on owner/manager's approved marketing plan and records indicated in Procedure 4 with actions taken to carry out Procedures 2 and 3. If required steps were taken, the Consortium will determine that good faith efforts were made.
- Examine whether persons from identified ethnic groups or special populations in the area applied for and became tenants or owners of units that were affirmatively marketed.

If one or more such groups are not represented or are significantly under-represented, the Consortium will review the procedures to determine what changes, if any, might be implemented to make affirmative marketing efforts more effective.

The Consortium will take corrective actions if it is found that contractors fail to carry out the procedures required of them. If remedial actions are not successfully completed, the Consortium will consider appropriate sanctions including disqualifying a sponsor, owner or manager from future participation in any Consortium housing programs.

The Consortium will carry out assessment activities and complete a written assessment of affirmative marketing efforts to be included in the annual performance report to HUD. This assessment will cover marketing relative to units constructed or rehabilitated and first made available for occupancy during the performance year.

7. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Tulsa County, as lead entity for the Metropolitan Tulsa HOME Consortium and the CDBG Urban County, and as required by the HOME regulations at 24 CFR Part 92.351, has established procedures and requirements to establish and oversee minority outreach efforts for its members participating in both federal grant programs. The procedures will ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women in all contracts entered into by the HOME Consortium and CDBG Urban County with such persons or entities, public and private, in order to facilitate activities to provide affordable housing. The Consortium and Urban County have established actions to be taken to assure that minority business enterprises and women business enterprises are used when possible in the procurement of property and services, where procurement is applicable to the funded project.

There are several practices and procedures in place to encourage the participation of Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) in contracts and construction projects. Minority utilization is encouraged in all hiring practices with regard to Consortium and Urban County construction projects, including:

- a. Bid advertisements encourage MBE/WBE businesses to participate in all bids.
- b. Pass-through requirements that private and nonprofit groups and individuals acting as sub-recipients of HOME funds, and Subrecipient contracts and construction contracts for CDBG funds contain clauses encouraging the local and area MBE/WBE certified businesses to participate in activities by requiring the contractor to take affirmative action steps to contract with small and minority owned firms and women business enterprises is a part of the requirements of 24 CFR Part

85.36 or 24 CFR Part 351. Affirmative Action steps include, but are not limited to, the following:

1. Including qualified small, minority and women business enterprises on solicitation lists.
2. Assuring that small, minority and women business enterprises are solicited whenever they are potential sources.
3. When economically feasible, dividing total requirements into smaller tasks or quantities to permit maximum small, minority and women business enterprises participation.
4. Where the requirement permits, establishing delivery schedules which will encourage participation by small, minority and women business enterprises.
5. Using the services and assistance of the Small Business Administration, the office of Minority Business Enterprise of the U.S. Department of Commerce and the local minority business development center that assists with management and technical aspects and maintains a directory of minority contractors, suppliers and vendors.
6. If any subcontracts are to be let, requiring the prime Contractor to take the affirmative action steps in 1 through 5 above.
 - c. An area agency recruitment list, media contact list, union/non-union contact list, and affirmative action assistance list is given to each project contractor, as well as anyone else who requests assistance.
8. If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, state its financing guidelines required under 24 CFR 92.206(b).

Not applicable; activity not funded.

HOPWA 91.220(I)(3)

1. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

Action Plan HOPWA response:

HOME and CDBG are the only sources of federal funding received by the Consortium and addressed in this plan. The only jurisdictions in Oklahoma that receive HOPWA funds are the City of Oklahoma City, the City of Tulsa, and the State of Oklahoma.

ESG 91.220(I)(4)

- 1 Identify the written standards for providing ESG assistance in accordance with 24 CFR 576.400(e)(1) and (e)(3).
- 2 If the Continuum of Care for the jurisdiction's area has established a centralized or coordinated assessment system that meets HUD requirements, describe the centralized or coordinated assessment system and the requirements for using the system, including the exception for victim service providers, as set forth under 24 CFR 576.400(d)
- 3 Identify the process for making awards and how the jurisdiction intends to make its allocation available to nonprofit organizations, and in the case of urban counties, funding to participating units of local government.
- 4 If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), specify the plan for reaching out to and consulting with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities or services that receive funding under ESG.
- 5 Describe the performance standards for evaluating ESG activities.
6. Describe the consultation with each Continuum of Care that serves the jurisdiction in determining how to allocate ESG funds, develop performance standards, evaluate outcomes of activities assisted by ESG funds, and develop funding policies, and procedures for the administration and operation HMIS

Action Plan ESG response:

HOME and CDBG are the only sources of federal funding received by the Consortium and addressed in this plan. The only jurisdictions in Oklahoma that receive ESG funds are the City of Oklahoma City, the City of Tulsa, and the State of Oklahoma.

OTHER NARRATIVES AND ATTACHMENTS

Include any action plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.